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September 3, 2021

VIA ECF

Judge Paul A. Engelmayer
United States District Court
40 Foley Square, Room 2201
New York, NY 10007

Re: *Gill v. National Football League, et al.*, No. 1:21-cv-01032: Plaintiff's
Request for a Rule 16 Initial Case Management Conference

Dear Judge Engelmayer:

Pursuant to Rule 16(b)(2) and this Court's Individual Rule 2.B., Plaintiff Sietel Singh Gill writes to request an initial case management conference with this Court. Plaintiff is eager to begin discovery, but no scheduling order has yet been issued.

As this Court knows, Plaintiff's case was originally filed on February 2, 2021. Defendants filed their notice of appearance that same month, and later moved to dismiss this action pursuant to Rule 12. That motion was fully briefed as of June 24, 2021. Since that time, the parties conducted their first Rule 26(f) conference on July 21, 2021; exchanged draft joint letters and case management schedules; and held a second Rule 26(f) conference on September 1, 2021.

At this point, it is apparent to Plaintiff that Defendants intend to await further direction from this Court before engaging in the discovery process. Defendants have taken weeks to substantively respond to Plaintiff's requests for feedback to proposed drafts and declined to join Plaintiff's request for an initial case conference.

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Accordingly, while the Plaintiff still endeavors to submit a joint letter and proposed schedule within two weeks pursuant to Rule 26(f)(2), Plaintiff writes separately to request an initial case conference and attendant scheduling order. *See* Fed. R. Civ. P. 16(b)(2) (noting that such order must be issued “as soon as practicable”).

Respectfully submitted,

/s/ Raphael Janove

Christopher K. Leung
Raphael Janove

*Attorneys for Plaintiff Sietel Singh Gill
and the Proposed Class*

cc: All counsel of record (via ECF)